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February 22, 2007

The Honorable Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: dPi Teleconnect, LLC, Complainant/Petitioner v. BellSouth Telecommunications,
Incorporated, Defendant/Respondent
Docket No.: 2005-358-C

Dear Mr. Terreni:

Enclosed for filing are an original and one (1) copy of AT&T's Response to dPi Teleconnect, LLC's ("dPi") Second Set of Requests for Information in the above-referenced matter.

By copy of this letter, I am serving all parties of record with a copy of this response as indicated on the attached Certificate of Service.

Sincerely,

A handwritten signature in black ink that reads "Patrick W. Turner" followed by a stylized flourish.

Patrick W. Turner

PWT/nml
Enclosure
cc: All Parties of Record
DM5 #668813

**THIS DOCUMENT IS AN EXACT DUPLICATE OF THE E-FILED COPY
SUBMITTED TO THE COMMISSION IN ACCORDANCE WITH ITS ELECTRONIC
FILING INSTRUCTIONS.**

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

dPi TELECONNECT, LLC,)	
)	
Complainant,)	
)	Docket No. 2005-358-C
v.)	
)	
BELLSOUTH TELECOMMUNICATIONS,)	
INC.)	
)	
Defendant.)	

**AT&T's RESPONSE TO dPi TELECONNECT, LLC'S ("dPi")
SECOND SET OF REQUESTS FOR INFORMATION**

BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina ("AT&T") respectfully submits its response to dPi Teleconnect, LLC's ("dPi") Second Set of Requests for Information ("Second Set of RFIs"), dated February 13, 2007.

General Objections

1. AT&T objects to each Request to the extent that it purports to impose upon AT&T any obligations more onerous or far reaching than set forth in the South Carolina Rules of Civil Procedure.

2. AT&T objects to each Request to the extent that it would require AT&T to reveal information or documents that are protected from disclosure by the attorney-client privilege, the work-product doctrine, or any other applicable privilege.

3. AT&T objects to each Request to the extent that it seeks the mental impressions or work product of its attorneys.

4. AT&T objects to each Request to the extent that it seeks copies of documents that are a matter of public record and therefore available to the Plaintiff.

5. AT&T objects to each Request to the extent that it is irrelevant and that the information sought does not appear reasonably calculated to lead to the discovery of admissible evidence.

6. AT&T objects to each Request to the extent that the information sought is unreasonably cumulative or duplicative.

7. AT&T objects to each Request to the extent that the information sought is obtainable from some other source that is more convenient, less burdensome, or less expensive.

8. AT&T objects to each Request to the extent that the party seeking this information has had ample opportunity by discovery in the action to obtain the information sought.

9. AT&T objects to each Request to the extent that it is vague and overly broad.

10. AT&T objects to each Request to the extent that it seeks to require AT&T to produce a document it does not create or maintain in the ordinary course of business.

11. AT&T objects to each Request to the extent that responding to it would be unduly burdensome and/or expensive.

12. AT&T is a large corporation with employees located in many different locations in South Carolina and in other states. In the course of its business, AT&T creates countless documents that are not subject to Commission or FCC retention of records requirements. These documents are kept in numerous locations that are

frequently moved from site to site as employees change jobs or as the business is reorganized. AT&T will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that any Request purports to require more, AT&T objects on the grounds that compliance would impose an undue burden or expense.

13. AT&T reserves the right to supplement its responses to Requests as additional information responsive to the Requests becomes available.

Specific Responses

REQUEST: For each of the reasons identified in **RFI 1-14 of dPi Teleconnect's First Set of Request for Information to BellSouth Telecommunication, Inc.**, ("For each of the promotions for which dPi Teleconnect, LLC, applied for credit but was denied, please identify and explain each and every reason why dPi Teleconnect, LLC, was not eligible for the credit or why the credit was otherwise denied.") as a reason why dPi Teleconnect, LLC, was not eligible for a particular credit, please provide as an example an actual copy of the underlying order/request and/or order establishing the underlying service that was not eligible for the promotion.

RESPONSE: See AT&T's response to Item No. 1-15.

REQUEST: For each of the promotions identified in response to **RFI 1-12 of dPi Teleconnect's First Set of Request for Information to BellSouth Telecommunications, Inc.**, ("Please identify with particularity each of the promotions under which dPi Teleconnect, LLC, sought any credit, which request was denied by BellSouth since January 1, 2002.") please identify BellSouth end users who made requests since January 1, 2002, with characteristics the same as dPi Teleconnect LLC's requests. Please indicate what these end users were charged when implementing these services, including any and all recurring charges, non-recurring charges, and promotional charges.

RESPONSE: AT&T objects to this Request on the grounds that it is overly broad and that responding to this Request as written would be unduly burdensome and expensive.

AT&T also objects to this Request to the extent that it is not reasonably calculated to lead to the discovery of admissible evidence that is relevant to any issue in this complaint. dPi is requesting information related to services that have been offered by AT&T since January, 2002. dPi's complaint is only related to services AT&T has offered since the Fall of 2003.


Subject to and without waiving the foregoing objections, AT&T states that it does not maintain the information in the format it has been requested. AT&T further states that any AT&T end user who made requests with characteristics the same as dPi Teleconnect LLC's requests, would have been billed charges as dPi was billed. AT&T end users who did not qualify as reacquisition or winover customers and/or who were ordering Basic Local Service with only non-rated blocks to features would be charged recurring charges for that service and non-recurring charges appropriate for the original service order. AT&T end users who were reacquisition or winover customers and purchased, at a minimum, Basic Local Service and two custom calling and/or touchstar features would qualify for two of the promotions listed in RFI 1-12 and would, therefore, receive the appropriate promotional credits. AT&T end users who met the qualifications of Secondary Service Order Charge Waiver as stated in the General Subscriber Services Tariff (GSST) would have the Secondary Service Order Charge waived.

REQUEST: Please supplement your response to RFI 1-16 of dPi Teleconnect's First Set of Request for Information to BellSouth Telecommunication, Inc., ("For each of categories of promotions for which dPi Teleconnect, LLC, applied for credit but was denied, please indicate the amount of credit requested; the amount of credit granted; and the amount of credit denied, from January 1, 2002, to the present.") to indicate, for each of the reasons identified as a reason why dPi Teleconnect, LLC, was not eligible for a particular credit, the total dollar amount of credits applied for but denied for the particular reason given. In other words, dPi Teleconnect, LLC, wants to know how many times/how much credit was denied for every reason given as a reason for denying credit.

RESPONSE: In response to RFI 1-16, AT&T provided a spreadsheet listing the promotion, credit given, credit requested and credit denied, beginning in 2003 through 2006. AT&T objects to supplementing this response as requested on the grounds that doing so would be unduly burdensome and on the grounds that dPi has had ample opportunity by discovery in this docket to obtain the information sought.

While AT&T maintains the information necessary to respond to the request, it does not maintain that information in a format that allows AT&T to quickly or easily respond to the Request. Instead, AT&T would have to manually review records associated with each relevant service order to provide the supplemental information requested. dPi already is in possession of the end user telephone numbers submitted and the associated service orders, and those records contain the same responsive information as AT&T's records contain. dPi, therefore, can obtain and process the requested information as easily as AT&T could.

Respectfully submitted on this 22nd day of February, 2007.

By: Patrick W. Turner 
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667952

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

CERTIFICATE OF SERVICE

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for AT&T South Carolina (“AT&T”) and that she has caused AT&T’s Response to dPi Teleconnect, LLC’s (“dPi”) Second Set of Requests for Information in Docket No. 2005-358-C to be served upon the following on February 22, 2007.

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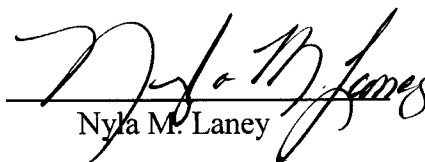
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DM5 # 610276